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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Andres Gomez,
Plaintiff,
v.
Kieu Hoang Winery, LLC, a
California Limited Liability,
Defendants.

Case No: 3:21-cv-09471-SI

**Declaration of Andres Gomez in
Response to Order to Show Cause**

Honorable Judge Susan Illston

DECLARATION OF ANDRES GOMEZ

I, Andres Gomez, declare:

1. I am the plaintiff in the above-captioned case. The facts stated below are based upon my personal knowledge, and if called as a witness, I could competently testify thereto.
2. I visited the website for Kieu Hoang Winery in March 2021 while I was physically in the State of California, and also in August 2021, to obtain information about the Winery.
3. I have family in northern California.
4. I am aware that northern California has a wealth of vineyards and wineries.
5. In March 2021, while I was in California, I was making plans and intended to visit family in northern California.
6. As part of this visit, I intended to wine taste and identified Kieu Hoang Winery as a location I was interested in experiencing.
7. I am interested in the process of making wine and have visited numerous wineries in California and Florida.
8. I enjoy purchasing wine as gifts to friends and family.
9. To obtain information about Kieu Hoang Winery, including what might set it apart from other wineries in the area, I visited the Winery's website.
10. However, when I attempted to navigate it, I encountered numerous accessibility design faults that prevented me from navigating the site successfully using SRS.
11. Because of my encounter with and knowledge of the accessibility barriers on the website, I decided not to visit Kieu Hoang Winery and was deterred from doing so.
12. I remain deterred from visiting Kieu Hoang Winery and its website due to the

1 existing barriers and uncertainty about the existence of yet other barriers.

2
3 I declare under penalty of perjury under the laws of the State of California and
4 the United States that the foregoing is true and correct.

5
6 Dated: April 8, 2022

7 By: Andres Gomez
8 9AE8FD450EF7348E27B85680A20A75A9 ready**sign**
9 Andres Gomez